

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF ARKANSAS
TEXARKANA DIVISION**

GLORIA BRADFORD, Individually and as Class Representative on Behalf of All Similarly Situated Persons; NED BURNETT, JR., Individually and as Class Representative on Behalf of All Similarly Situated persons; SAMUEL ALEXANDER, Individually and as Class Representative on Behalf of All Similarly Situated persons; BOOKS, ETC., by and through GLORIA BRADFORD, Class Representatives on Behalf of All Those Similarly Situated; and STELLA PATRICIA SMITH, Individually and as Class Representative on Behalf of All Similarly Situated persons;

PLAINTIFFS

NO. 4:05-cv-4075 HFB

VS.

UNION PACIFIC RAILROAD COMPANY,
A Delaware Corporation,

DEFENDANT.

(Jury Trial Demanded)

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Oral Argument Requested

The named Plaintiffs and the classes they represent (hereafter the "Class Plaintiffs"), pursuant to the Federal Rule of Civil Procedure (FRCP), Rule 23, hereby move for certification of the following classes: (1) Evacuation Class; (2) Property Damage Class; (3) Economic Loss class, and (4) Liability Issues Class. This Motion is supported by the separate Brief in Support of Motion for Class Certification, filed herewith.

Respectfully submitted this 30 day of June, 2006.

Respectfully Submitted,

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By: s/M. David Karnas
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CERTIFICATE OF SERVICE

I, M. David Karnas, attorney for Plaintiffs, hereby certify that on the 30th day of June, 2006, I electronically filed the foregoing PLAINTIFFS' MOTION FOR CLASS CERTIFICATION with the Clerk of this Court using the CM/ECF system which will send notification of such filing to the following attorneys:

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